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CERTIFIED MAIL, RETURN RECEIPT REQUESTED
No. 7002-0510-0001-4604-4271

November 15, 2002

Mr. Mike Ribordy
Environmental Protection Agency
77 West Jackson Blvd., SR-6J
Chicago, IL 60604-3590

Re **Intent to Comply**
EPA's Sauget Order Docket No. V-W-'02-C-716

Dear Mr. Ribordy:

Solutia, as Attorney in Fact for Pharmacia Corporation, and in its own right, gives notice to U.S. EPA of its unequivocal intention to comply with all terms of Order Docket No. V-W-'02-C-716. Enclosed is a brief comment on the statement of work.

Sincerely,

Brent Gilhousen
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Brent J. Gilhousen

Enclosure

Cc: Thomas Martin, Esq.
EPA, Chicago

Order Docket No. V-W-'02-c-716

Comment on SOW Schedule

Section V of the Statement of Work (SOW) attached to the UAO requires that the construction of the remedial action at the Sauget Area 2 Site Groundwater Operable Unit be completed within 8 months of the effective date of the UAO. Based on the requirements of the SOW, it is our opinion that this schedule cannot be satisfied.

The UAO requires the submission and approval of a RD/RA Work Plan, preparation of prefinal and final designs, and the approval of these designs before construction of the work can commence. Given that we estimate that the construction of the barrier wall alone will take at least 6 to 8 months to complete, we do not believe that the required plans and designs can be prepared and approved in a timely enough manner to allow construction to be completed by the scheduled date of July 15, 2002, even with an expedited construction schedule.

At a meeting held at USEPA's offices on April 5, 2002, Solutia presented a which envisaged that construction of the system could be completed 8 months after the effective date of the order and after receipt of design approval. In effect, therefore, the schedule anticipated that the entire 8 month period would be available for construction of the system. Subsequent discussions with the leading jet grouting contractor in the country have confirmed our original schedule assumptions. Consequently, we request that the schedule set forth in the SOW be revised to make the start of the 8 month period coincident with the receipt of USEPA's Notice of Authorization to Proceed with RA, i.e., Item 9 in the Summary of Major deliverables in Section V of the SOW should begin at the same time as Item 6.